CHAPTER 7.0 ALTERNATIVES

CEQA Guidelines Section 15126(d)(2) states that the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects. CEQA specifically requires the discussion of a "no project" alternative. In addition, CEQA requires that a reasonable range of alternatives to the project be discussed, including alternative locations. The reasonable range is to include alternatives that focus on the mitigation or avoidance of significant effects associated with the proposed project, that permit a reasoned choice for the decision maker, and that are feasible. Section 15126(d)(5) states that among the factors which may be taken into account when addressing the feasibility of alternatives are site availability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

The following discussion includes a "no project" alternative. The objectives of the project are understood to be those described in the Project Description (*Chapter 2*) of this Program EIR. The objectives are to provide for the modifications and additions needed for the existing water and sewage distribution, collection, treatment, incorporating current population projections, planning criteria, and new information from specific development plans.

The CMWD and CSD are the exclusive central agencies for the provision of water and sewer services, respectively, within their service areas. For the Master Plan Updates that are the subject of this Program EIR, alternative locations are not possible. However, the Master Plan Updates are comprised of individual improvement projects and there are or may be possible variation in the size, phasing, location, and implementation of many of the individual projects, especially in the plans' later phases. For these reasons, no alternative location for the project is herein considered, but a discussion of the variability of individual project alternatives, in the context of the existing and planned systems, is included.

The Master Plan Updates are guidance documents for the adequacy, continued operation, and expansion of systems that are, for the most part, already in place. The project components are designed to correct deficiencies in the existing system and to provide the new facilities that will be needed to accommodate growth and land use changes in the city at the appropriate time. Because this is the case, it is not reasonable to propose alternatives that would construct entirely new systems, and clearly no

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alternative location for the system is feasible. Therefore, the discussions in this section are restricted to the No Project alternative required by CEQA, and to the possible changes to individual projects in the Master Plan Updates that could occur in response to changing conditions in the City's growth. The environmentally superior alternative is also discussed as required by CEQA.

7.1 NO PROJECT ALTERNATIVE

Under the No Project alternative, the proposed Water and Sewer Master Plan Updates would not be adopted by the City of Carlsbad. This does not mean, however, that the facilities in the Master Plan Updates or other facilities based on development and need in the city, would not be constructed. All projects in the Master Plan Updates could be constructed or implemented on an individual project basis whether or not the Master Plan Updates are adopted. Potential environmental impacts identified in this Program EIR would still be likely to occur. This alternative would, however, deprive the City of Carlsbad of a valuable planning tool, and one that is informative for those interested in the City's future plans and facilities.

Many of the projects in the Master Plan Updates are intended to remedy deficiencies that were identified in the modeling of the City's water and sewer systems or to correct problems or potential problems in the operation of that system. If the Master Plan Updates were not adopted, the deficiencies and potential problems would remain and would still require remedy through, in most cases, the improvement projects that make up the integrated programs in the Master Plan Updates. Likewise, the new projects in the plans are predicated on the improvements needed to make the system adequate to serve the City's planned future growth. Under the No Project alternative, the same improvements would likely be brought forward for approval as individual projects, but in piecemeal fashion and not as an integrated program that had been evaluated as a single environmental project. In addition, the No Project alternative would deprive the City of the opportunity to streamline environmental review of future projects through the use of the Program EIR and subsequent updates. For these reasons, the No Project alternative offers no environmental advantages in either procedures, impacts, or public information over the proposed Master Plan Updates.

7.2 PLANNING AND LAND USE ALTERNATIVES

The Water and Sewer Master Plan Updates were developed using the best available information on population growth; proposed, planned, and forecast growth and development; means of effluent disposal; requirements and recommendations for peak



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flows, volumes, and facility capacities; and other factors affecting future City water and sewer utilities planning. The planning period for the Master Plan Updates is long-term, extending to 2020, and almost all the factors in such long-range planning are to some degree uncertain. Most land use planning, until projects are implemented as buildout of the City proceeds, is subject to change for a variety of reasons. Thus, the Districts' staff will continue to monitor factors likely to affect land use in the City and identify changes that could affect the forecasts and assumptions used to develop the improvement programs in the Master Plan Updates.

Most of the projects in the Master Plan Updates are upgrading and modification of existing facilities. In such cases, the location of the project is usually fixed. Nonetheless, adjustments are possible because the Master Plan Updates are guiding documents rather than rigid templates.

Flexibility in the implementation of the Master Plan Updates will occur at a specific project implementation level. Partly as a result of the mitigation program in this Program EIR, evaluation of the individual projects in the Master Plan Updates can occur at the stage of project approval or implementation. Given the speculative and to some degree uncertain nature of future conditions, this process is the only practical way to assure that feasible alternatives to each project, if desirable or necessary, are developed. As an example, if development plans approved for a given area change the street pattern in that area, the location of pipelines projected in the Master Plan Updates may change. If density or type of development in a given area changes, the storage capacity needed to serve that area, and thus the size of water reservoirs may change, and the capacity of sewer collection facilities may also change. Individual project review in the planning stage is the only time an informed decision on such matters can occur.

7.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As analyzed in *Section 7.1*, the No Project alternative would not result in reduced environmental effects when compared to the proposed project. The proposed project would result in the same or less impacts when compared to the No Project alternative because of its comprehensive program to identify, avoid, and minimize impacts to environmental resources in the overall study area. As such, the proposed project is considered to be the environmentally superior alternative.

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